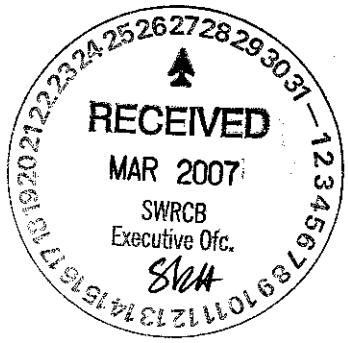
3/20/07 BdWrshp Item 8
Water Recycling
Deadline: 3/27/07 5 pm

DUBLIN SAN RAMON SERVICES DISTRICT

7051 Dublin Boulevard
Dublin, California 94568
Phone: 925 828 0515
FAX: 925 829 1180
www.dsrsd.com

March 22, 2007



State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

Attention: Clerk of the Board

Subject: Statewide Water Recycling Policy
3/20/07 Board Meeting

Dear Chair Doduc and Members of the State Board:

Dublin San Ramon Services District is a community services district providing water, wastewater and recycled water services to the citizens of Dublin, San Ramon and Pleasanton. The District has been an active proponent of the use of recycled water for many years and is participating in a joint partnership with East Bay Municipal Utility District to deliver approximately 6,000 acre feet of recycled water to irrigation users in the San Ramon Valley from its wastewater treatment plant. The District also works in partnership with Zone 7 Water Agency to support that agency's program to improve and protect the groundwater resources of the Livermore-Amador Valley. As such, we believe that we have special insight into the complex inter-relationships of state and local policies that are intended to protect public health, the environment, and the water resources of the State of California while at the same time promoting recycled water development.

We read with interest that your Board is considering the development of a Statewide Water Recycling Policy. We believe that the development of such a policy is a timely and important undertaking by the State Board. The inconsistent application of different policies at different locations throughout the State of California has hindered the development of otherwise sound recycled water projects. The development of these projects is of paramount importance to the future water supply of the State of California and furthers the goals of the Governor's Water Recycle Task Force of 2002. We also believe it is important that consistent statewide policy encourages the use of recycled water while allowing local decision makers to identify which projects are appropriate to implement in a given area.

While the issues that are identified in your recent staff report of March 20, 2007 (copy enclosed) are all important issues to be discussed, we believe a few are particularly relevant and important.

Protecting Groundwater Basins from the Accumulation of Salt We believe that it is important to protect groundwater basins from the accumulation of salt. However, it is important to realize that recycled water is not the only source of salt that impacts groundwater basins. Salt from potable water irrigation (which is often higher than ambient ground water) salt from urban run-off and other sources also impact the basin. While it is important to protect these basins, recycled water should not be singled out. Rather, salt from recycled water should be addressed as part of an overall salt management program that is adopted by a local agency to protect the quality of water in the groundwater basin.

Limitation of Salt Concentration in Recycled Water We also believe that a limit on the concentration of salt in recycled water should not be established. Rather, local agencies should have an opportunity to find other ways to mitigate the impact including participation in salt management projects that offset the salt loading in the most cost-effective way. Doing so would not hinder the adopted State public policy of promoting recycled water.

Groundwater Monitoring for Recycled Water Projects We do not believe that special requirements for groundwater monitoring should be imposed on recycled water irrigation projects unless it can be demonstrated that the groundwater basin underlying those projects is of such special quality that specific monitoring is required. The treatment used to produce recycled water under California Department of Health Services Standards, Title 22, has been proven safe after many decades of implementation. There is no further need for monitoring of recycled water. Doing so will only add to the cost and discourage implementation of more recycled water projects. If there is any concern that recycled water could affect the groundwater basin, the parameters of concern should be addressed in the waste discharge permit for the recycled water project.

Groundwater Recharge Reuse Projects We recognize that groundwater recharge projects for indirect potable reuse are a particularly sensitive topic given public perception of this issue. They must also be implemented in a way that protects public health and the environment. Nevertheless, there is a need for consistent Statewide policy for these sorts of projects. We believe that as a minimum any such policy should provide for local public support and provide that any project by fully protective of public health for existing and emerging contaminants.

Anti-Degradation Policy The anti-degradation policy (Resolution 68-16 of the State Water Board) should also be revisited to balance it against existing State policy for promoting and encouraging the use of recycled water. Uniform guidance and policy across the State about how to interrupt the anti-degradation policy at local levels would help the implementation of recycled water projects.

Definitions of Maximum Benefit and Best Practical Treatment Finally, we encourage the Sate Board to develop clear, usable and practical definitions of what constitutes "Maximum Benefit to the People of the State" and what is "Best Practical Treatment or Control" for water

recycling projects. Having consistent definitions for these phrases will ensure that requirements for recycled water projects are consistently developed and applied throughout the State.

Thank you for the opportunity to provide these comments to the Regional Board and to the State Water Resources Control Board on this topic. We believe that your efforts to develop a Statewide Water Recycling Policy is a critical component to enable California to meet the goal identified in Water Code Section 13577 of recycling 1,000,000 acre feet of water by 2010.

Thank you very much for your comments.

Sincerely,

BERT MICHALCZYK
General Manager

BLM:sjc

Attachment

cc: DSRSD Board of Directors

March 6, 2007

STATE WATER RESOURCES CONTROL BOARD
BOARD MEETING SESSION – DIVISION OF WATER QUALITY
MARCH 20, 2007

ITEM 8

SUBJECT

WORKSHOP REGARDING DEVELOPMENT OF A STATEWIDE WATER RECYCLING POLICY

DISCUSSION

The purpose of this item is to solicit public comment on whether the State Water Resources Control Board (State Water Board) should develop a statewide Water Recycling Policy and on the issues such a policy would address. Recycled water is a major source of water supply in California and a major component in California's plan for meeting the state's growing water demand. The California Water Plan estimates that recycled water usage can increase from half a million acre-feet per year in 2003 to two million acre-feet per year in 2030. The Recycled Water Task Force issued a report in June 2003 that contained recommendations that California should implement to achieve this goal. Some of the recommendations concerned the need to consistently apply state statutes and regulations regarding water recycling and water quality. The purpose of a statewide policy would be to provide direction to the Regional Water Boards on how to interpret state statutes, regulations, plans, and policies with respect to water recycling projects, thus ensuring consistent interpretation of the requirements among the Regional Water Boards.

Staff has identified the following issues that could be addressed in a water recycling policy:

Irrigation Projects and Salts

- What should the State Water Board do to protect groundwater basins in the state from the accumulation of salt, including nitrate?
- To protect groundwater basins from the accumulation of salt, should the concentration of salt in recycled water used for irrigation be limited? If so, what procedures should be used to establish the limitations?
- To limit the discharge of nitrate to groundwater, should the State Water Board require recycled water users to prepare nutrient management plans?
- Should groundwater monitoring be required for recycled water irrigation projects?

Groundwater Recharge Reuse Projects

- What requirements should be placed on groundwater recharge reuse projects to protect the public from toxic constituents?

Impoundments

- What requirements should be placed on impoundments to prevent them from degrading underlying groundwater?

Anti-degradation Policy

- Should the State Water Board modify Resolution 68-16 (Anti-degradation Policy) to encourage water recycling or to clarify the language? Is so, what modifications should be made to the policy?

- Should the Water Recycling Policy define what is "maximum benefit to the people of the state" and/or what is "best practical treatment or control" for water recycling projects?

Agency Coordination

- The Department of Health Substances is developing regulations for groundwater recharge reuse projects. Should the State Water Board not address some issues related to groundwater recharge reuse projects, since they may be addressed by the Department of Health Services regulations?

Aquifer Storage and Recovery Projects

- Should the scope of the policy also cover aquifer storage and recovery projects?

Subsequent to this public workshop, the State Water Board will consider whether there is a need for further action on this issue.

POLICY ISSUE

Should the State Water Board pursue development of a Water Recycling Policy?

FISCAL IMPACT

State Water Board staff work associated with or resulting from the Board's direction will be addressed with existing and future budgeted resources.

REGIONAL WATER BOARD IMPACT

Yes, all Regional Water Boards.

STAFF RECOMMENDATION

That the State Water Board direct staff to pursue development of a statewide Water Recycling Policy.